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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NEETA THAKUR, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 3:25-cv-04737-RL

**DECLARATION OF LINDA S.
GILLERAN IN SUPPORT OF
PLAINTIFFS' LETTER BRIEF
REGARDING PRELIMINARY
INJUNCTION VIOLATION**

1 I, Linda S. Gilleran, declare as follows:

2 1. I am a member in good standing of the State Bar of California and the bar of this
3 Court. I am a partner of Farella Braun + Martel LLP and represent all Plaintiffs in this action. I
4 respectfully submit this declaration in support of Plaintiffs' Letter Brief regarding Preliminary
5 Injunction Violation. I have personal knowledge of the facts set forth in this declaration, and
6 could testify competently to them if called upon to do so.

7 2. Attached as **Exhibit 1** is a true and correct copy of an August 1 and 2, 2025 email
8 string between me and defense counsel regarding the grant terminations.

9 3. On August 1, 2025, Plaintiffs learned that the Trump Administration, including
10 specifically the National Science Foundation ("NSF"), froze hundreds of grants to the University
11 of California, Los Angeles ("UCLA"). Plaintiffs immediately contacted counsel for Agency
12 Defendants, requesting the exemplar termination letters, via the emails included in Exhibit 1. On
13 that same day, counsel for Agency Defendants sent two letters in response.

14 4. Attached as **Exhibit 2** is a true and correct copy of the July 30, 2025 letter from
15 Ms. Lisa Scott-Morring, NSF's Acting Division Director of Grants and Agreements regarding
16 Notice of Award Suspensions, addressed to Dr. Julio Frenk, UCLA's Chancellor.

17 5. Attached as **Exhibit 3** is a true and correct copy of the August 1, 2025 letter from
18 Ms. Scott-Morring, regarding Updated Notice of Award Suspensions, addressed to Dr. Frenk.

19 I declare under penalty of perjury under the laws of the State of California and the United
20 States that the foregoing is true and correct.

21 Executed this 4th day of August, 2025, in San Francisco.

22
23 By: 
24 Linda S. Gilleran

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